

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: **BANKRUPTCY PROCEEDING**

MILDRED EUBANKS BARNES **CASE NUMBER: 25-50620 KMS**

**MOTION TO APPROVE AGREED ORDER FOR ABANDONMENT
AND TERMINATION OF §362 AUTOMATIC STAY**

COMES NOW, Sunbelt Federal Credit Union (“Sunbelt”), by and through its counsel, and files this Motion to Approve Agreed Order for Abandonment and Termination of §362 Automatic Stay, and in support thereof would show unto the Court the following:

1.

The Court has jurisdiction over the parties and the subject matter pursuant to 28 U.S.C. §1334. This matter is a core proceeding pursuant to 28 U.S.C. §157(b)(2)(A), (G).

2.

The instant case is a proceeding pursuant to Chapter 7 of the Bankruptcy Code.

3.

Sunbelt and the Debtor have reached an agreement providing for, *inter alia*, relief from the §362 automatic stay provisions as to Sunbelt and its subject matter personal property, namely a 2019 Ford F150 (VIN 1FTEWCP7KKE59326). Attached hereto as Exhibit “1” is an Agreed Order for Abandonment and Termination of §362 Automatic Stay.

4.

Pursuant to Rule 9014(b) and 7004(b)(9) of the Federal Rules of Bankruptcy Procedure, this Motion is served upon all necessary parties, and all necessary parties have approved the Agreement in the form of the Agreed Order attached hereto.

WHEREFORE, Sunbelt requests the Court enter its Order granting Motion to Approve Agreed Order for Abandonment and Termination of §362 Automatic Stay approving and entering the Agreed Order attached hereto, and Sunbelt prays for such other and further relief as is just and proper in the premises.

Respectfully submitted,

SUNBELT FEDERAL CREDIT UNION

BY: s / Derek A. Henderson
DEREK A. HENDERSON
Attorney for Sunbelt Federal Credit Union

CERTIFICATE OF SERVICE

I, DEREK A. HENDERSON, do hereby certify that I have this date served, via United States Mail, postage prepaid, or via the ECF Notification Service, a true and correct copy of the above and foregoing Motion to Approve Agreement Relating to Relief from the §362 Automatic Stay to the following:

Thomas Carl Rollins, Jr.
trollins@therollinsfirm.com

Zachary S. Wessler, Sr.
Chapter 7 Trustee
chapter7trustee@wesslerlawgroup.com

Office of United States Trustee
USTPRegion05.JA.ECF@usdoj.gov

This, the 18th day of June, 2025.

s / Derek A. Henderson
DEREK A. HENDERSON

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